

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,)	
)	
)	
PLAINTIFF,)	
vs.)	
)	Case No. 21-CR-00314-RAW
)	
BRENDA BURDUE SAVAGE)	
)	
DEFENDANT.)	

**MOTION TO RECOGNIZE DEFENSE WITNESSES AS A WITNESS IDENTIFIED
WITH AN ADVERSE PARTY**

COMES NOW Defendant Brenda Burdue Savage, by and through her counsel of record Jacob T. Reynolds, to move this court to recognize two witnesses endorsed on the Defendant's witness list as "witnesses identified with an adverse party" under Federal Rule of Evidence Rule 611 (Herein "Rule 611").

Rule 611 allows for leading questions under two instances: on cross examination and when a party calls a hostile or adverse witness. In this case, the Defendant has endorsed two witnesses on her witness and exhibit list which she seeks designation as "witnesses identified with an adverse party:"

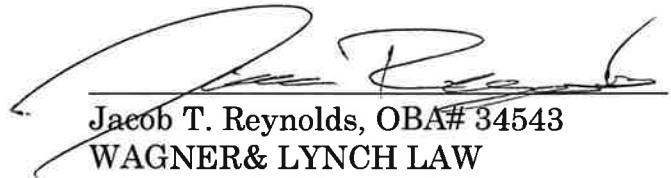
1. Elijah Hass
McAlester Police Department Officer
2. Don Hass
Former McAlester Police Department Officer and Lead Investigator in the present case.

Because of these witnesses' role in the investigation of the Defendant, and their effort to build a case against her, the Defendant requests that this court designate

them as “witnesses identified with an adverse party.” The Defense feels their testimony is particularly valuable; but the Government has chosen not to endorse the lead investigator of their own case and one of the main evidence gathers for their case in chief.

WHEREFORE the Defendant prays that this Court recognize that the above listed witnesses are squarely within the definition of a “witnesses identified with an adverse party” under Rule 611 and designate them as such to allow for leading examination.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Jacob T. Reynolds', is written over a horizontal line.

Jacob T. Reynolds, OBA# 34543
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